

# **EXHIBIT N**

**AFFIDAVIT OF TROY SEATON**

STATE OF MICHIGAN)

) ss.

COUNTY OF WAYNE)

I, Troy Seaton, being duly deposed and under oath, states as follows based upon my own personal knowledge and capacity to make this affidavit:

1. I am an adult resident of the State of Michigan and otherwise competent to make this affidavit. If called to testify to the facts herein, I would and could do so with first-hand knowledge and under the penalty of perjury.
2. I am currently and at all relevant times have been employed by the City of Inkster as a Media Specialist.
3. I began employment for the City of Inkster in October of 2008. I was initially hired as a camera operator; however, my duties have since changed to include running various social media accounts for the City of Inkster, including the City of Inkster Twitter Account, Instagram Account, YouTube Account, Facebook Page and Department of Public Services Facebook Page.
4. As the Media Specialist at the City of Inkster, one of my duties is administering the City of Inkster Twitter Account, Instagram Account, YouTube Account, Facebook Page and Department of Public Services Facebook Page.

5. As the Media Specialist it is my duty to know the makeup of the municipal social media pages.
6. To my knowledge, outside of the social media pages I run as the Media Specialist, the City's parks and recreation, police department, fire department, library and ordinance enforcement departments have a social media presence as follows: (1) Parks and Recreation Facebook Page; (2) an Inkster Police Department Facebook Page and Instagram Page; (3) Inkster Ordinance Enforcement Facebook Page; (4) Leanna Hicks Library Facebook Page and Instagram Page; and (5) Inkster Fire Department Facebook Page<sup>1</sup>.
7. Of the above listed Pages, the Parks and Recreation Facebook Page and the Inkster Fire Department Page, while activated, do not have an associated administrator with them. At this time, the City is taking measures to either assign an administrator or abandon the Page.
8. To my knowledge, neither the City of Inkster Twitter Account, Instagram Account, YouTube Account, Facebook Page, nor the Department of Public Services Facebook Page has or had a custom or practice of blocking or banning any person from accessing its Pages. I understand that the City does


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<sup>1</sup> The Inkster Housing Commission also has a Facebook page. However, Inkster Housing Commission is a separate legal entity from the City of Inkster and a body corporate under the Michigan Housing Facilities Act, Public Act 18 of 1933. The City has no possession and/or control of the Inkster Housing Commission's social media presence.

not allow for blocking or banning individuals from commenting on its social media platforms.

9. As the administrator of the City of Inkster Twitter Account, Instagram Account, YouTube Account, Facebook Page and the Department of Public Service Facebook Page, I understand that I cannot block or ban individuals from using the must seek the City attorney's guidance before removing any comments that are not considered protected speech. I will inform any successor of City of Inkster Twitter Account, Instagram Account, YouTube Account, Facebook Page, the Parks and Recreation Facebook Page, Inkster Fire Department Facebook Page, and the Department of Public Service Facebook Page administrator accordingly.

Further affiant sayeth not.

  
Troy Seaton  
City of Inkster Media Specialist

Subscribed and sworn to before me this

24 day of August, 2021

  
Notary Public  
Wayne County, Michigan

My Commission Expires: 02/09/2021

